

1 Thomas A. Ericsson, Esq.  
ORONOS & ERICSSON, LLC  
2 Nevada Bar No. 4982  
1050 Indigo Drive, Suite 120  
3 Las Vegas, Nevada 89145  
Phone: (702) 878-2889  
4 Fax: (702) 522-1542  
tom@oronozlawyers.com  
5 Attorney for Defendant Arnold

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 EDWIN ARNOLD,

12 Defendant.

Case No. 2:17-cr-00042-APG-DJA

STIPULATION TO CONTINUE  
SENTENCING

(First Request)

13 IT IS HEREBY STIPULATED AND AGREED by and between the United States  
14 of America, through Shaheen Torgoley and Allison Reese, Assistant United States  
15 Attorneys, together with Thomas Ericsson, counsel for Defendant Edwin Arnold, that  
16 the sentencing hearing currently scheduled for August 25, 2021 be vacated and set to a  
17 date and time convenient to this Court, but no sooner than 45 days from the current  
18 sentencing date.

19 This stipulation is entered into for the following reasons:

- 20
- 21 1. The Defendant is in custody and does not object to the continuance.
  - 22 2. Undersigned counsel needs additional time to prepare for Defendant's
  - 23 sentencing.
- 24

1 hearing.

2 3. The parties agree to the continuance.

3 4. Additionally, denial of this request for continuance could result in a  
4 miscarriage of justice.

5 5. The additional time requested by this Stipulation is made in good faith and  
6 not for purposes of delay.

7 This is the first request for a continuance of the sentencing hearing.

8 DATED this 17th day of August 2021.

9 /s/ Thomas A. Ericsson  
10 Thomas A. Ericsson, Esq.  
Counsel for Defendant Arnold

11 /s/ Shaheen Torgoley  
12 /s/ Allison Reese  
13 Shaheen Torgoley, Esq.  
Allison Reese, Esq.  
14 Counsel for the United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:17-cr-00042-APG-DJA

Plaintiff,

ORDER

vs.

EDWIN ARNOLD,

Defendant.

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for August 25, 2021, be vacated and continued to November 10, 2021, at 2:00 p.m. in LV Courtroom 6C.

DATED: August 18, 2021

  
THE HONORABLE ANDREW P. GORDON  
U.S. DISTRICT COURT JUDGE